

### **REMARKS**

Initially, the undersigned would like the Examiner for his time at least over the course of 1/13/11-1/24/11 where multiple correspondence were exchanged to arrive at at least some of the subject matter and/or amendments presented herein. Claims 6, 9, 10, 25, 28, 29, 32, 33, 35, 43, 45-47 and 50-56 are pending in the application. Claims 6, 9, 10, 25, 28, 29, 32, 33, 35, 43, 45-47 and 50-56 were rejected, and claims 6, 9, 10, 25, 28, 29, 32, 33, 35, 43, 45-47 and 50-56 are amended herein by way of RCE. It is to be appreciated that while reference may be made back to certain parts of the application in this Reply (e.g., page numbers, line numbers, Figs., etc.), that such referencing is not to be interpreted in a limiting manner (e.g., to limit the scope of the claims and/or features therein to the particular portion(s) referenced), but is instead merely done for purposes of explanation, illustration and/or ease of understanding. Reconsideration of the application in light of the following remarks is respectfully requested.

#### **I. REJECTION OF CLAIMS 53-56 UNDER 35 U.S.C. §112, FIRST PARAGRAPH**

Claims 53-56 are rejected under 35 U.S.C. § 112, first paragraph, for allegedly failing to comply with the written description requirement. Withdrawal of this rejection is respectfully requested for at least the following reasons.

**Claim 53** has been amended herein to comprise subject matter that is believed to comply with the written description requirement, at least by amending the subject matter mentioned in the OA out of claim 53. Claims 54-56 are believed to be compliant as well at least because they depend from claim 53.

For at least the foregoing reasons, withdrawal of this rejection is respectfully requested.

**II. REJECTION OF CLAIMS 6, 9, 10, 28, 29, 32, 33, 35, 43 AND 45 UNDER 35 U.S.C. §103(a)**

Claims 6, 9, 10, 28, 29, 32, 33, 35, 43 and 45 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Janakiraman et al., U.S. Patent No.: 7,369,986 (*hereinafter* “Janakiraman”), in view of Virga et al., “Transliteration of proper names in cross-language information retrieval,” ACL 2003 (*hereinafter* “Virga”).

Withdrawal of this rejection is respectfully requested for at least the following reasons.

**Independent claims 6 and 43** provide for, among other things, **receiving a text string** in a first alphabet on a keyboard, the text string **inputted as a first keystroke typing sequence according to a first keyboard layout of the first alphabet**, but **the keyboard actually comprising a second keyboard layout of a second alphabet**, the second keyboard layout different from the first keyboard layout such that **the text string is not inputted as a second keystroke typing sequence according to the second keyboard layout**, and **converting the text string in the first alphabet to a second text string in the second alphabet** via a phonetic mapping scheme between the first alphabet and the second alphabet, **such that the second text string corresponds to the second keystroke typing sequence**. That is, a user may type a text string in a first alphabet (e.g., English) on a keyboard as if the keyboard has a layout corresponding to the first alphabet (e.g., English), but where the keyboard actually has a layout of a second alphabet (e.g., Hindi). Accordingly, the user types the text string as a first keystroke typing sequence (e.g., as if the keyboard layout was in English), but that is different than a second keystroke typing sequence (e.g., as if the keyboard layout was in Hindi). The text string may be phonetically converted to a second text string in the second alphabet (e.g., Hindi).

It is respectfully submitted that the cited references fail to teach these features alone or in combination. For example, Janakiraman merely teaches transliterating a previously entered phrase or word that is displayed to the user as part of a webpage. Stated differently, a text string may be received (for transliteration) by selecting from (a list of) previously entered text (strings) (e.g., via a webpage that is displayed to a user).

It is respectfully submitted that **transliterating a previously entered phrase or word that is displayed to the user as part of a webpage**, as taught by Janakiraman, does not teach **receiving a text string** in a first alphabet on a keyboard, the text string **inputted as a first keystroke typing sequence according to a first keyboard layout of the first alphabet**, but **the keyboard actually comprising a second keyboard layout of a second alphabet**, the second keyboard layout different from the first keyboard layout such that **the text string is not inputted as a second keystroke typing sequence according to the second keyboard layout**, and **converting the text string in the first alphabet to a second text string in the second alphabet** via a phonetic mapping scheme between the first alphabet and the second alphabet, **such that the second text string corresponds to the second keystroke typing sequence**, as provided in independent claims 6 and 43. In particular, it is believed that Janakiraman is silent as to **a text string being inputted as a first keystroke typing sequence according to a first keyboard layout, where the first keystroke typing sequence is not the same as a second keystroke typing sequence corresponding to a second text string inputted according to a second keyboard layout**.

Moreover, it is respectfully submitted that Virga fails to make up for the deficiencies of Janakiraman. Accordingly, claims 6 and 43 and the remaining rejected claims that depend therefrom are believed to be allowable over the suggested combination and withdrawal of this rejection is respectfully requested.

### **III. REJECTION OF CLAIMS 46, 47 AND 50-56 UNDER 35 U.S.C. §103(a)**

Claims 46, 47 and 50-56 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Janakiraman in view of Virga and further in view of Schafer et al., "Inducing Translation Lexicons via Diverse Similarity Measures and Bridge Languages," Proceedings of 6<sup>th</sup> Conference on Natural Language Learning 2002 (*hereinafter* "Schafer"). Withdrawal of this rejection is respectfully requested for at least the following reasons.

**Dependant claims 46, 47 and 50-52** depend from independent claim 43, which is believed to be allowable over Janakiraman in view of Virga for at least the foregoing reasons. It is believed that Schafer fails to make up for the deficiencies of Janakiraman in view of Virga with regard to claim 43. Independent claim 43 is thus believed to be allowable over the suggested combination, and claims 46, 47 and 50-52 are likewise believed to be allowable over the suggested combination because they depend from claim 43. Accordingly, claims 46, 47 and 50-52 are believed to be allowable over the suggested combination and withdrawal of this rejection is respectfully requested.

**Independent claim 53** provides for, among other things, **receiving a text string** in a first alphabet on a keyboard, the text string **inputted as a first keystroke typing sequence according to a first keyboard layout of the first alphabet**, but **the keyboard actually comprising a second keyboard layout of a second alphabet**, the second keyboard layout different from the first keyboard layout such that **the text string is not inputted as a second keystroke typing sequence according to the second keyboard layout**, and **converting the text string in the first alphabet to a second text string in the second alphabet** via a phonetic mapping scheme between the first alphabet and the second alphabet, **such that the second text string corresponds to the second keystroke typing sequence**.

For at least the foregoing reasons with regard to claims 6 and 43 it is believed that claim 53 is allowable over Janakiraman in view of Virga. Moreover, it is respectfully submitted that Schafer fails to make up for these deficiencies of Janakiraman in view of Virga. Accordingly, claim 53 and the remaining rejected claims that depend therefrom are believed to be allowable over the suggested combination and withdrawal of this rejection is respectfully requested.

For at least the foregoing reasons, withdrawal of this rejection is respectfully requested.

**IV. REJECTION OF CLAIM 25 UNDER 35 U.S.C. §103(a)**

Claim 25 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Janakiraman in view of Virga and further in view of Zsigri et al., “Learn Zhuyin,” (*hereinafter* “Zsigri”). Withdrawal of this rejection is respectfully requested for at least the following reasons.

**Dependant claim 25** depends from independent claim 6, which is believed to be allowable over Janakiraman in view of Virga for at least the foregoing reasons. It is respectfully submitted that Zsigri fails to make up for the deficiencies of Janakiraman in view of Virga with regard to claim 6. Independent claim 6 is thus believed to be allowable over the suggested combination, and claim 25 is likewise believed to be allowable over the suggested combination because it depends from claim 6. Accordingly, claim 25 and the remaining rejected claims that depend therefrom are believed to be allowable over the suggested combination and withdrawal of this rejection is respectfully requested.

**V. CONCLUSION**

For at least the above reasons, the claims currently under consideration are believed to be in condition for allowance.

Should the Examiner feel that a telephone interview would be helpful to facilitate favorable prosecution of the above-identified application; the Examiner is invited to contact the undersigned at the telephone number provided below.

Should and fees be due as a result of the filing of this response, the Commissioner is hereby authorized to charge the Deposit Account Number 50-5088, **306213.01**.

Respectfully submitted,  
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